

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**Root, Inc., et al.,**

*Plaintiffs,*

v.

**Silver, et al.,**

*Defendants.*

:  
: Case No. 2:23-cv-512  
:  
: Judge Sarah D. Morrison  
:  
: Magistrate Judge Chelsey M. Vascura  
:  
:  
:  
:

**JOINT REQUEST FOR PROTECTIVE ORDER**

Now come Plaintiffs, Root, Inc., Caret Holdings, LLC and Root Insurance Agency, LLC and Defendants, Brinson Caleb Silver, Collateral Damage, LLC, Eclipse Home Design, LLC, William Campbell and Quantasy & Associates, LLC (collectively the “Requesting Parties”) and respectively request that this Court enter a protective order for the purposes of discovery in this action. The proposed protective order has been agreed upon by the Requesting Parties and is in conformance with the Southern District of Ohio Forms of this Court. The proposed order is attached as Exhibit A and a word version has been transmitted to Magistrate Judge Vascura’s chambers.

Respectfully submitted,

/s/ William D. Kloss, Jr.

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**MEMORANDUM IN SUPPORT**

The parties have submitted voluminous discovery requests, including requests for production of documents. Some of the information and documents responsive to those discovery requests will contain sensitive personal information and/or proprietary business information. By way of example, personal banking information, credit card information, loan documentation, personal text messages and other private information will be exchanged. Additionally, business plans and records, personnel files, and investigative materials are likely to be produced. In short, some of the information being produced should be kept confidential and used solely for this litigation.

The parties have utilized the Southern District of Ohio Forms in preparing the proposed Stipulated Protective Order, which is submitted contemporaneously with this motion. With the exception of inserting the case caption and an additional footnote, the form is unchanged.

The parties respectfully submit that the Court should grant their request.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was filed electronically on this 26<sup>th</sup> day of April 2023 with the Clerk of Court using the CM/ECF system. Service will be made through the Court's CM/ECF system on all parties and attorneys so registered, and all parties may access this filing through the Court's system.

A copy was also sent by regular U.S.P.S. mail and email to the following:

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